

UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF WISCONSIN

IN RE
Jeanne M. Kurimski

Debtor.

Chapter: 13

Case No. 19-20601-beh

MOTION OF DEBTOR FOR PERMISSION TO PURSUE LOSS MITIGATION REMEDIES

The debtor, Jeanne M. Kurimski, through her attorneys, Riverwood Legal and Accounting Services SC, hereby moves the court for permission to pursue loss mitigation remedies with the creditor, Lakeview Loan Servicing, LLC and its loan servicer Arvest Central Mortgage Company (hereinafter collectively and at all times material hereto “the creditor”), and in support of said motion, alleges as follows:

1. The creditor holds a promissory note and mortgage encumbering real property owned by the debtor and located at 1646 Birchwood Dr, Green Bay, WI 54304-2937.
2. The creditor wishes to offer and pursue loss mitigation and work out alternatives with the debtor, including, but not limited to, a modification of the mortgage loan.
3. To the extent it is necessary, the automatic stay should be modified to permit the parties to offer, negotiate and enter into loss mitigation or mortgage modification options.

Drafted by:

Matthew Richard DeMark
Riverwood Legal and Accounting Services SC
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WHEREFORE, the debtor requests, that to the extent the stay applies, it be modified to permit the parties to offer, negotiate and enter into loss mitigation or mortgage modification options, that any order entered pursuant to this motion be effective immediately upon its entry and for such further relief as may be just and equitable.

Dated this 28th day of March, 2022.

Riverwood Legal and Accounting Services SC
Attorneys for debtor

By: 

Matthew Richard DeMark
State Bar No. 1035121

United States Bankruptcy Court
Eastern District of Wisconsin

In re	Jeanne M. Kurimski)	
	<i>[Set forth here all names including married, maiden, and</i>)	
	<i>trade names used by debtor within last 8 years.]</i>)	
)	
	Debtor)	Case No.
)	<u>19-20601-beh</u>
Address	<u>1646 Birchwood Drive, Green Bay, WI 54304</u>)	
)	
)	Chapter
Last four digits of Social Security or Individual Tax-payer Identification)	<u>13</u>
(ITIN) No(s), (if any):	<u>7906</u>)	
)	
Employer's Tax Identification (EIN) No(s), (if any):	<u></u>)	
)	

**NOTICE OF MOTION OF DEBTOR FOR PERMISSION TO PURSUE LOSS MITIGATION
REMEDIES**

The debtor, Jeanne M. Kurimski, through her attorneys, Riverwood Legal and Accounting Services SC, hereby moves the court for permission to pursue loss mitigation remedies with Lakeview Loan Servicing, LLC and its loan servicer Arvest Central Mortgage Company (hereinafter collectively and at all times material hereto "the creditor").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before April 7, 2022, your or your attorney must:

File with the court a written objection to the motion and a request for a hearing at:

Clerk, U.S. Bankruptcy Court
U.S. Courthouse
517 E. Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4500

If you mail your request and objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also send a copy to:

Matthew Richard DeMark
Riverwood Legal and Accounting Services SC
N19W24200 Riverwood Dr Ste 145
Waukesha WI 53188-1193

Rebecca R. Garcia
Chapter 13 Trustee
PO Box 3170
Oshkosh, WI 54903-3170

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: March 28, 2022

Signature: 

Name: Matthew Richard DeMark

Address: Riverwood Legal and Accounting Services
SC

N19W24200 Riverwood Dr Ste 145

Waukesha, WI 53188-1193

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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, the notice of motion and motion for permission to pursue loss mitigation remedies was electronically filed in this case and served upon the following parties using the ECF system:

Rebecca R. Garcia Trustee


Eastern District U.S. Trustee

Christopher C. Drout (Attorney for Lakeview Loan Servicing LLC)

I further certify that on the same date, I mailed the same document(s) by the United States Postal Service to the following non-ECF participants:

Lakeview Loan Servicing LLC
c/o Arvest Central Mortgage Company
801 John Barrow Road, Suite 1
Little Rock, AR 72205

Dated this 28th day of March, 2022.


Matthew Richard DeMark, Attorney
Riverwood Legal and Accounting Services SC